

Appl. No. 10/792,366  
Examiner: VU, PHU, Art Unit 2871  
In response to the Office Action dated January 24, 2006

Date: April 24, 2006  
Attorney Docket No. 10113881

Rejections Under 35 U.S.C. 102(b)

Claims 1-6, 9-10 and 13-14 are rejected under 35 U.S.C. 102(b) as being anticipated by Huynh. Applicant respectfully traverses the rejections for the reasons that follow.

To anticipate a claim, a reference must teach every element of the claim. In this regard, the Federal Circuit has held:

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

"The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Claim 1 recites an electronic device comprising:

a printed circuit board including a ground layer;

**a liquid crystal display module, disposed on the printed circuit board, including a central portion, a surrounding portion, an anti-ESD wire, and a first contact, wherein the central portion is surrounded by the surrounding portion, and the anti-ESD wire is disposed on the surrounding portion, and wires of the liquid crystal display module are schemed between the anti-ESD wire and the central portion, and the first contact is coupled to the anti-ESD wire and the ground layer respectively so that ESD in the liquid crystal display module is ground via the anti-ESD wire and the first contact; and**

a controller, disposed on the printed circuit board and coupled to the liquid crystal display module, for resetting the liquid crystal display module at a predetermined interval.

Claims 9 and 13 recite a method for preventing ESD and a machine-readable storage medium including similar limitations.

Appl. No. 10/792,366  
Examiner: VU, PHU, Art Unit 2871  
In response to the Office Action dated January 24, 2006

Date: April 24, 2006  
Attorney Docket No. 10113881

Huynh teaches a protected LCD having a branch line between the power supply and LCD output. In column 2, lines 48-57, Huynh teaches:

According to the invention, the device comprises a branch line 9 in parallel with the electronic module 2 in such a way that its input 10 is connected to the power supply 1, while its output 11 is connected to the floating ground MF at the output 7 of the display module 4.

The device therefore comprises **two parallel branches**, one comprising the electronic module 2 and the other comprising the branch line 9, connected at one end to the electrical power supply 1 and at the other end to the floating ground MF.

[Emphasis added]

In the rejections, the Examiner identifies LCD module 4 as the alleged liquid display module, branch line 9 as the alleged anti-ESD wire, and electronic module 2 as the alleged surrounding portion of the liquid crystal display module of claims 1, 9 and 13. The Examiner further identifies control lines 5-i as the wires of the liquid crystal display module of claims 1, 9 and 13, and states that the "wires of the display module (5-I) are schemed between the anti-ESD wire and the central portion." See page 2 of the office action.

Applicant first notes that the Examiner fails to identify what portion of the Huynh device is the "central portion." Namely, the claims recite "a liquid crystal display module ... including a central portion, a surrounding portion ...." Applicant submits that a fair and proper application of the claim language requires the Examiner to identify what he considers to be the "central portion" of the liquid crystal display module of claims 1, 9 and 13.

In any case, the Examiner identifies LCD module 4 as the alleged liquid display module of the claims. However, control lines 5-i are not schemed between branch line 9 and a central portion of LCD module 4. See Figs. 1-3 of Huynh. Applicant therefore submits that Huynh fails to teach

Appl. No. 10/792,366

Examiner: VU, PHU, Art Unit 2871

In response to the Office Action dated January 24, 2006

Date: April 24, 2006

Attorney Docket No. 10113881

or suggest that wires of the liquid crystal display module are schemed between the anti-ESD wire and the central portion, as recited in claims 1, 9 and 13.

For at least the reasons described above, it is Applicant's belief that Huynh fails to teach or suggest all the limitations of claims 1, 9 and 13. Applicant therefore respectfully requests that the rejections of claims 1, 9 and 13 be withdrawn and the claim passed to issue. Insofar as claims 2-8, 10-12, and 14-16 depend from claims 1, 9 and 13 either directly or indirectly, and therefore incorporate all of the limitations of claims 1, 9 and 13, it is Applicant's belief that these claims are also in condition for allowance.

Rejections Under 35 U.S.C. 103(a)


Claims 7, 11 and 15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Huynh in view of Kim. Claims 8, 12 and 16 are rejected under 35 U.S.C. 103(a) as being unpatentable over Huynh in view of Yuuki.

As noted above, it is Applicant's belief that claims 7-8, 11-12 and 15-16 are allowable by virtue of their dependency from claims 1, 9 and 13, respectively. For this reason, the Examiner's arguments in connection with these claims are considered moot and will not be addressed here.

Conclusion

For the reasons described above, the Applicant believes that the application is now in condition for allowance and respectfully requests so.

Respectfully submitted,

  
\_\_\_\_\_  
Nelson A. Quintero  
Reg. No. 52,143  
Customer No. 34,283  
Telephone: (310) 401-6180